

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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DANIEL LOVELACE AND HELEN  
LOVELACE

Plaintiffs,

vs.

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
DR. BABU RAO PAIDIPALLI &  
DR. MARK P. CLEMONS

Defendants.

Case No. 2:13-CV-02289 dkv

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**NOTICE OF SPECIAL APPEARANCE FOR NON-PARTY WITNESSES  
METHODIST HEALTHCARE – MEMPHIS HOSPITALS**

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Craig C. Conley and Ormonde B. DeAllaume of the Law Firm of Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C., hereby enter their special appearance as counsel for non-party witnesses Methodist Healthcare – Memphis Hospitals (“the Witness”) in this case. Said special appearance is made for the limited purpose of seeking (1) an order quashing or modifying the Subpoena served on the Witness by Defendants Pediatric Anesthesiologists, PA and Dr. Baby Rao Paidipalli, and (2) a protective order prohibiting the parties to this action from seeking information from the Witness that requires disclosure of privileged, confidential, or protected documents, or otherwise places an undue burden on the Witness. Mr. Conley and Ms. DeAllaume set forth their complete contact information below:

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Respectfully submitted,

s/ Ormonde B. DeAllaume

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*Attorneys for Non-Party Witness  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 21st day of August, 2013, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

s/ Ormonde B. DeAllaume  
Ormonde B. DeAllaume